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Palo Verde Solar II, LLC, Blythe Solar Power Project
Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
Blythe Solar Power Project Unit 3, LLC and
Blythe Solar Power Project Unit 4, LLC*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MMR GROUP, INC.,
MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC,

Plaintiffs,

vs.

STA DEVELOPMENT, LLC (F/K/A SOLAR
MILLENNIUM, LLC), SOLAR TRUST OF
AMERICA, LLC, SOLAR MILLENNIUM AG,
SOLAR MILLENNIUM, INC., CA I-10
SOLAR, LLC, PALO VERDE SOLAR I, LLC,
PALO VERDE SOLAR II, LLC, BLYTHE
SOLAR POWER PROJECT UNIT 1, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT
UNIT 3, LLC AND BLYTHE SOLAR POWER
PROJECT UNIT 4, LLC

Defendants.

Case No. 3:11-cv-01521-EMC

**THIRD STIPULATION TO EXTEND
DEFENDANTS' TIME TO RESPOND
TO AMENDED COMPLAINT AND
[PROPOSED] ORDER**

**The Honorable Judge
Edward M. Chen**

STIPULATION

Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA
DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) respectfully request
that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
by two weeks from November 21, 2011 to December 5, 2011.

12 On November 4, the parties requested, and this Court later granted, a one-week extension
13 of time for Defendants to respond to the Amended Complaint from November 7 to November 14,
14 2011 because the parties were in advanced stages of settlement discussions. On November 14,
15 2011, this Court again granted a second one-week extension from November 14 to November 21
16 because the parties had made significant progress in settlement discussions. That progress has
17 continued during the last week and the parties expect to execute a settlement agreement forthwith.
18 Due to the upcoming Thanksgiving holiday and continued progress in settlement negotiations, the
19 parties ask for a two-week extension of the time for the STAD Defendants to respond to the
20 Amended Complaint. The parties' request will have a *de minimis*, if any, impact on the schedule.
21 In the interests of judicial economy, the parties therefore request that Court extend the STAD
22 Defendants' time to respond to the Amended Complaint by two weeks from November 21, 2011
23 to December 5, 2011.

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2 Dated: November 18, 2011
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MILBANK, TWEED, HADLEY & McCLOY LLP

6 By: /s/ Aaron Renenger
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Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
Blythe Solar Power Project Unit 3, LLC and
Blythe Solar Power Project Unit 4, LLC
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Dated: November 18, 2011
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**WATT, TIEDER, HOFFAR
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22 Solutions, LLC and Southwestern Power Group II, LLC
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/22/11

